James D. Veltrop AXINN, VELTROP & HARKRIDER LLP 90 State House Square Hartford, CT 06103 Tel: (860) 275-8100

James P. Doyle AXINN, VELTROP & HARKRIDER LLP 114 West 47<sup>th</sup> Street New York, NY 10036 Tel: (212) 728-2200

Attorneys for Plaintiff
PRODUCTION RESOURCE GROUP,
L.L.C.

# UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

PRODUCTION RESOURCE GROUP, L.L.C.,

Plaintiff,

v.

SGM TECHNOLOGY FOR LIGHTING SpA and TECHNI-LUX, INC.

Defendants.

Civil Action No. 08-Civ-6331 (KMK)

2/26033k

MOTION TO ADMIT COUNSEL PRO HAC VICE

PURSUANT TO RULE 1.3(C) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, James P. Doyle, a member in good standing of the bar of this Court, hereby move for an Order allowing admission pro hac vice, in connection with the above-captioned action, of

Jeremy C. Lowe Axinn, Veltrop & Harkrider LLP 90 State House Square Hartford, CT 06103

Phone: (860) 275-8100/Fax: (860) 275-8101

Jeremy C. Lowe is a member in good standing of the Bar of the State of Illinois.

There are no pending disciplinary proceedings against Jeremy C. Lowe in any State or Federal

Court.

Dated: August 28, 2008

Respectfully submitted,

James P. Doyle

Axinn, Veltrop & Harkrider LLP 114 West 47<sup>th</sup> Street

114 West 47<sup>th</sup> Street New York, NY, 10036

Phone: (212) 728-2228 Fax: (212) 261-5660 Email: jpd@avhlaw.com James D. Veltrop AXINN, VELTROP & HARKRIDER LLP 90 State House Square Hartford, CT 06103 Tel: (860) 275-8100

James P. Doyle AXINN, VELTROP & HARKRIDER LLP 114 West 47<sup>th</sup> Street New York, NY 10036 Tel: (212) 728-2200

Attorneys for Plaintiff PRODUCTION RESOURCE GROUP, L.L.C.

### UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

PRODUCTION RESOURCE GROUP, L.L.C.,

Plaintiff,

v.

SGM TECHNOLGY FOR LIGHTING SpA and TECHNI-LUX, INC.

Defendants.

Civil Action No. 08-Civ-6331 (KMK)

### **DECLARATION OF JAMES P. DOYLE** IN SUPPORT OF MOTION TO ADMIT COUNSEL PRO HAC VICE

- I, James P. Doyle, hereby declare as follows:
- 1. I am a partner at Axinn, Veltrop & Harkrider LLP, counsel for Plaintiff in the abovecaptioned action. I am familiar with the proceedings in this case. I make this declaration based on my personal knowledge of the facts set forth herein and in support of Plaintiff's MOTION TO ADMIT COUNSEL PRO HAC VICE.

2. I am a member in good standing of the bar of the State of New York. I was admitted to practice in New York in 1995. I was admitted to the bar of the United States District for the Southern District of New York in 2000, and am in good standing with this Court.

3. I have known Jeremy C. Lowe since 2007.

4. Mr. Lowe is a partner at Axinn, Veltrop & Harkrider LLP. He is a member in good standing of the bar of the State of Illinois. Attached as Exhibit A hereto is a "Certificate of Admission to the Bar of Illinois," which states that Mr. Lowe is a member in good standing of the Illinois bar.

5. I have found Mr. Lowe to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 28, 2008

## **EXHIBIT A**

# Certificate of Admission To the Bar of Illinois

I, Juleann Hornyak, Clerk of the Supreme Court of Illinois, do hereby certify that

Jeremy Chad Lowe

has been duly licensed and admitted to practice as an Attorney and Counselor of Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on May 2, 2000 and is in good standing, so far as the records of this office disclose.

In Witness Whereof, I have hereunto placed my hand and affixed the seal of said Supreme Court, at Springfield, in said State, this Tuesday, August 26, 2008.

Juliann Hornyal

#### **CERTIFICATE OF SERVICE**

I hereby certify that I am, this 28th day of August, 2008, causing Plaintiff PRG's MOTION TO ADMIT COUNSEL PRO HAC VICE, the accompanying DECLARATION OF JAMES P. DOYLE IN SUPPORT OF MOTION TO ADMIT COUNSEL PRO HAC VICE, and Plaintiff's proposed ORDER FOR ADMISSION PRO HAC VICE ON WRITTEN MOTION to be served on Defendants by causing true and correct copies of same to be delivered to Defendants' counsel at the address, and by the means, indicated below:

### By Hand

Lance J. Lieberman, Esq. Cohen, Pontani, Lieberman & Pavane LLP 551 Fifth Avenue New York, New York 10176

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